

FILED

UNITED STATES DISTRICT COURT

DEC 21 2007

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NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

CRIMINAL COMPLAINT

v.

**BELA BALINT,
ADRIAN GHIGHINA, and
CRISTINA SAVU**

CASE NUMBER:

07CR 0863

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Between on or about September 2005 and July 2006 in Cook county, and elsewhere, in the Northern District of Illinois defendant(s) did,

(Track Statutory Language of Offense)

having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmit or cause to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, as more specifically described in Counts One through Three on Attachment A,

in violation of Title 18 United States Code, Section(s) 1343 and 2.

I further state that I am a(n) Special Agent, ICE and that this complaint is based on the following facts:
Official Title

Continued on the attached sheet and made a part hereof: x Yes No



Signature of Complainant

Sworn to before me and subscribed in my presence,

December 21, 2007

Date

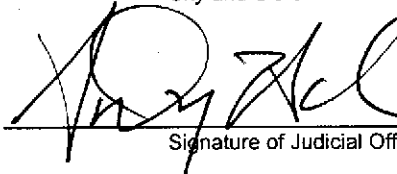
at

Chicago, Illinois

City and State

SIDNEY I. SCHENKIER, U.S. Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A - Western Union Wire Transfers Executing the Scheme

Ct.	Defendant	Transfer amount	Date	To Illinois from ...
1	BALINT	\$ 2,750.00	09/26/05	Fairfield, CT
2	GHIGHINA	\$ 850.00	11/02/05	Azle, TX
3	SAVU	\$ 2,839.99	07/18/06	New Iberia, LA

I, Matthew Siffermann, first being duly sworn, state the following under oath:

1. I am a Special Agent with the Bureau of Immigration and Customs Enforcement (ICE), within the Department of Homeland Security, Chicago Field Office. I have held that position since approximately November of 2006.

2. The following statements are based on my personal knowledge; conversations with other law enforcement officers; review of records maintained by various law enforcement authorities, including ICE and one of its predecessor Federal agencies, the Immigration and Naturalization Service (INS); and review of records maintained by various business and financial institutions, such as Western Union, and MoneyGram. This affidavit does not contain all the information known to law enforcement regarding this investigation, but rather, contains only those facts believed to be necessary to establish probable cause.

3. The government seeks this criminal complaint in order to charge DRAGOS GABRIEL TOADER with knowingly engaging in monetary transactions in property derived from specified unlawful activity, in violation of 18 USC § 1957, and to charge CRISTINA SAVU, ADRIAN GHIGHINA, and BELA BALINT with knowingly participating in a scheme to defraud, in violation of 18 USC § 1343.

4. In summary, co-schemers have identified TOADER, SAVU, GHIGHINA, and BALINT as knowing participants in a fraud scheme who, among other acts, used alias identification documents to receive fraud proceeds sent by victims to Western Union agents, and knowingly transmitted and caused to be transmitted outside of the United States funds derived from the fraud scheme. The co-schemers'

statements identifying TOADER, SAVU, GHIGHINA, and BALINT as knowing participants in the fraud scheme are corroborated by independent evidence gathered during the investigation.

Background

5. On March 8, 2007, 21 defendants were charged in an indictment in the Northern District of Illinois (case no. 06 CR 923, Darrah, J.) with engaging in a wire fraud scheme (the "Indicted Case"). In summary, the indictment alleged that between approximately November 2003 and April 2006, the defendants devised and participated in a scheme to defraud individuals who were tricked into believing that they were purchasing items that had been listed for sale on internet sites, such as eBay. It was part of the scheme that individuals located outside of the United States, principally in Romania (the "Foreign Co-schemers"), posed as legitimate sellers of goods on the internet from sites such as eBay. By posing as sellers of goods on the internet, the Foreign Co-schemers caused well more than 2,000 victims in the United States and abroad to wire transfer funds via Western Union to the defendants and other co-schemers in amounts totaling more than \$5,000,000 for items that were never delivered to the victims.

6. More specifically, the Foreign Co-Schemers developed victims through fraudulent advertisements of items for sale on various internet sales and auction forums, typically eBay. The Foreign Co-Schemers concluded that victims in the United States and Canada would more likely be duped into transmitting their money if the Foreign Co-schemers posed as sellers based in the U.S. and thereby

directed the victims to send their funds to an individual located in the United States. As a result, rather than directing the victims to wire transfer their funds to Romania, the Foreign Co-Schemers developed a network of individuals in the United States willing to repeatedly pick-up fraud proceeds from Western Union that had been transmitted by the victims. For providing this service to the Foreign Co-Schemers, the defendants in the Indicted Case were allowed to keep a portion (typically 20% to 40%) of the fraud proceeds collected, and were required to transmit the balance of the proceeds to Romania through various means.

7. Because repeatedly presenting oneself to Western Union in one's true identity to receive fraud proceeds would present an obvious risk of apprehension by law enforcement, the defendants in the Indicted Case learned or were instructed to repeatedly obtain alias identification documents in order to disguise their true identity when picking up fraud proceeds from Western Union agents.

8. Operating the scheme to defraud in this manner necessitated on-going communication between the Foreign Co-Schemers and those managing the receipt of the fraud proceeds in the United States. That communication generally took place in the following fashion: on a continuing basis, the co-schemers (generally located in the vicinity of Chicago) communicated to the Foreign Co-Schemers their changing aliases. The Foreign Co-schemers incorporated the alias names into their internet communications with potential fraud victims, usually as the "seller," "seller's agent," or "eBay agent" for the item being offered for sale. Once a particular victim agreed to purchase an item, he or she was directed to send the

funds via Western Union to the alias name provided by one of the defendants to the Foreign Co-Schemers.

9. At the time that the victim funded the wire transfer, Western Union issued to the victim "purchaser" a unique "money transfer control number," also known as an "MTCN." The MTCN served as confirmation from Western Union that payment had been received by Western Union or one of its agents (such as a currency exchange) from the purchaser. The victims were typically instructed by the Foreign Co-schemers to communicate the MTCN to the "seller" in order to confirm that payment for the item had been made and was ready to be received from Western Union.

10. Thus, once a victim had succumbed to the scheme by providing funds to Western Union, the victim generally communicated the MTCN to the Foreign Co-Schemers via the internet, cellular telephone, or fax in order to confirm for the "seller" that the victim had paid for the item he or she had agreed to "purchase," and that the funds were ready to be received from Western Union. In order to facilitate receipt of the funds by the one of the defendants in the Indicted Case, the Foreign Co-Schemers then communicated the MTCNs and other transactional data (name and location of sender of funds, amount to be received) provided by the victims to the defendants and other co-schemers via text message, e-mail, and telephone. Upon receiving this information, the defendants presented themselves, using alias identification documents, to a Western Union agent as the authorized payee for a wire transfer of funds from one of the victims of the fraud scheme.

11. In order to receive the funds, the defendants completed a Western Union "To Receive Money" form in which he or she provided the transactional information received from the Foreign Co-schemers pertaining to the transaction: i.e., name and location of the sender of the funds, the amount of money expected, and the MTCN. The defendants in the Indicted Case falsely represented their identities to Western Union agents when receiving proceeds from the fraudulent internet sales transactions, using alias names, false social security numbers, false telephone numbers, false addresses, and false and counterfeit identification documents purportedly issued by states such as Arizona, Connecticut, Florida, Illinois, Indiana, Michigan, Nevada, Ohio, Texas, Vermont, Virginia, Wisconsin, and Wyoming.

Specific Facts

12. Two cooperating witnesses who have pled guilty in the Indicted Case have implicated TOADER, BALINT, SAVU, and GHIGHINA as knowing participants in the wire fraud scheme. In summary, TOADER received information from the Foreign Co-schemers relating to wire transfers of funds by victims of the scheme. TOADER in turn dispatched that information to individuals, such as SAVU, BALINT, and GHIGHINA, who presented themselves to Western Union agents in alias names to receive the victims' funds at the behest of TOADER. Then, after paying a portion of the funds to the individuals who picked up the money from Western Union agents and retaining a portion of the funds for himself, TOADER caused the balance to be transmitted outside of the United States to the Foreign Co-

schemers.

Cristian Bentan

13. Cristian Bentan is a defendant in the Indicted Case and he pled guilty to participating in the scheme through a plea to one count of wire fraud on or about October 9, 2007. In his plea agreement, Bentan agreed to provide full and truthful cooperation to the government. In exchange, the government agreed in an 11(c)(1)(C) plea agreement to recommend that Bentan receive a sentence that was two-thirds of the low end of the applicable sentencing guideline range.¹

14. In addition to pleading guilty, Bentan has made statements to law enforcement summarizing his knowledge of facts relating to his participation in the fraud scheme. In those statements, Bentan also provided information regarding TOADER, SAVU, BALINT, and GHIGHINA to law enforcement agents.

15. Bentan advised that he first became involved in the fraud scheme in approximately mid-2004, and that until approximately the end of the summer of 2005, he worked in Chicago with the Western Union pick-up crew of Individual AD.² In addition to receiving fraud proceeds, Bentan stated that he assisted Individual AD in transmitting funds to the Foreign Co-schemers by depositing funds into bank accounts that Individual AD used to send funds to a bank in Cypress.

¹Bentan is currently scheduled to be sentenced on February 27, 2008.

²In his plea agreement in the Indicted Case, Bentan admitted that he used counterfeit identification documents in at least 10 alias names to receive fraud proceeds totaling approximately \$262,000 between approximately June 2004 and November 2006.

16. Bentan identified a number of other individuals receiving Western Union transactions from Individual AD, including Mihai Bledea and Igor Aslan, co-defendants with Bentan in the Indicted Case.³ Bentan stated that he overheard a conversation between Individual AD and Gabriel Constantin, a co-defendant in the Indicted Case, that led Bentan to believe that Individual AD got into the Western Union pick-up business through Constantin.

17. According to Bentan's statement, around the end of the summer of 2005, Individual AD decided to leave the United States and asked Bentan to take over his Western Union pick-up crew in Chicago. Individual AD would continue to receive information relating to victims' Western Union transactions from the Foreign Co-schemers, and then forward the information to Bentan through text messages to Bentan's cellphone.

18. According to Bentan's statement, Bentan ran Individual AD's Western Union pick-up crew for a few weeks after Individual AD left the United States. Shortly after Individual AD left, Bentan first met TOADER, BELA BALINT, aka "Bebe," and an individual Bentan knew as "Rosu" (GHIGHINA). Bentan put TOADER, BALINT, and "Rosu" to work receiving money from Western Union derived from transactions that Bentan received from Individual AD.

19. Bentan stated that after a few weeks he had a disagreement with Individual AD over who would run Individual AD's Western Union pick-up crew in

³Bledea and Aslan have since both pled guilty to one count of wire fraud in case no. 06 CR 923.

Chicago and Individual AD decided to give the crew to TOADER. Bentan stated that he owed Individual AD money from previous pickups that had not been transmitted to Individual AD, so Bentan continued to do Western Union pickups to pay off that debt.

20. Bentan stated that TOADER, BALINT, and "Rosu" (GHIGHINA) lived at an apartment building at 3201 W. Devon Avenue, Chicago, and that TOADER routinely asked Bentan to go to a Chase bank located near that address to send money. Bentan stated that TOADER utilized a fake consulting business in order to send money to Individual AD and another Foreign Co-schemer through a bank account in Cyprus. Bentan stated that between about October 2005 and May 2006, he caused more than \$60,000 to be wire transferred to Romania through MoneyGram to TOADER and others working with him. Bentan also stated that in some instances the MoneyGram wire transfers were sent by Bentan's wife in her name at the direction of Bentan.

21. At the time of his arrest by Federal authorities in December 2006, Bentan stated that he believed that BALINT was now conducting money pick-ups for TOADER in Florida.

22. Bentan advised that another individual who worked for TOADER was CRISTINA SAVU. Agents displayed for Bentan copies of a counterfeit Iowa driver license in the name of "Dana Schotzwann," counterfeit Wisconsin driver licenses in the name of "Maya Morritz" and "Klaudia Vanboritz," and counterfeit Michigan drivers licenses in the name of "Michele Keolman," "Gretta Kollman," "Eryka

Wandez," and "Karla Vandermark." Bentan identified the person depicted on each of those counterfeit licenses as SAVU.

23. Agents also displayed for Bentan copies of counterfeit Wisconsin driver licenses in the name of "George Brown," "Dan Ackerman," "Paul Schultzer," and "George Goodman," and a counterfeit Texas drivers license in the name of "Kevin Walker." Bentan identified the person depicted on each of those counterfeit licenses as BALINT.

24. Agents also displayed for Bentan copies of counterfeit Iowa driver licenses in the name of "Maurice Schuman," "Dan Flinchum," and "Dan Smith." Bentan identified the person depicted on each of those counterfeit licenses as "Rosu." I have viewed the same counterfeit drivers licenses, and believe that they depict the same individual as the person whose photograph appears on an Illinois drivers license issued in the name of ADRIAN GHIGHINA.

25. Agents also displayed for Bentan copies of counterfeit Wisconsin driver licenses in the name of "Michael Krups," "Anthony Verlofsky," "Robert Brannik," "James Hastings," "Andrew Hofferma," "Samuel Pioletti," and "Scott Jenken." Bentan identified the person depicted on each of the counterfeit licenses as Mihai Bledea, a co-defendant in the Indicted Case. Bentan stated that Bledea participated in the fraud scheme by receiving victims' funds from Western Union agents, that Bledea had obtained transactional information from Individual AD, and that Bentan had obtained false IDs for Bledea on a number of occasions.

Adrian Ianc

26. Adrian Ianc is a defendant in the Indicted Case and he pled guilty to participating in the scheme through a plea to one count of wire fraud on or about June 21, 2007. In his plea agreement, Ianc agreed to provide full and truthful cooperation to the government. In exchange, the government agreed in an 11(c)(1)(C) plea agreement to recommend that Ianc receive a sentence that was two-thirds of the low end of the applicable sentencing guideline range.⁴

27. In addition to pleading guilty, Ianc made statements to law enforcement summarizing his knowledge of facts relating to his participation in the fraud scheme. In those statements, Ianc also provided information regarding TOADER, BALINT, and SAVU to law enforcement agents.

28. Ianc stated that he first met TOADER in or around March 2006 at the restaurant where Ianc was the employed, called La Palma. Ianc stated that it was common knowledge within the community of Romanians known to Ianc that TOADER has been involved in operating a crew of many people who were picking up fraud proceeds at Western Union locations, and that TOADER was known to be in charge of obtaining counterfeit identification for his associates.

29. Ianc stated that he obtained false identification documents that Ianc used to participate in the scheme⁵ from an individual who operated at a variety of

⁴Ianc is currently scheduled to be sentenced on February 20, 2008.

⁵In his plea agreement in the Indicted Case, IANC admitted that he used counterfeit identification documents in at least 8 alias names to receive fraud proceeds

locations on the south-west side of Chicago, First Name Unknown (FNU) Last Name Unknown (LNU). On one occasion when Ianc traveled to meet meet FNU LNU, Ianc saw TOADER meeting with FNU LNU near TOADER's black Mercedes. Ianc stated he did not see what sort of business TOADER and FNU LNU were conducting, and never discussed the fact that he witnessed this meeting with either TOADER or FNU LNU.

30. In summary, Ianc described TOADER as a frequent customer of La Palma who boasted about his wealth and who was surrounded by a regular entourage of people. Ianc was shown a series of photographs of individuals and identified photographs depicting SAVU and BALINT as close associates of TOADER. Ianc stated that he knew BALINT by the names "Bebe" and "Bela." Ianc stated he knew that SAVU (who he knew as "Cristina") had been arrested by police for her involvement in the Western Union scheme. Ianc stated that SAVU drove a white Mercedes owned by Raimondoray Cerna, a co-defendant in the Indicted Case, which he believed SAVU may have obtained through SAVU's association with Gabriel Constantin.

31. Agents displayed for Ianc copies of counterfeit Wisconsin driver licenses in the name of "Michael Krups," "Anthony Verlofsky," "Robert Brannik," "Samuel Pioletti." IANC identified the man pictured on each as a person he knows as "Mike" (Mihai Bledea). Ianc stated that he did not know "Mike" well, but knew that he had

totaling approximately \$330,000 between approximately April 2004 and December 2006.

been arrested by police in the Western Union scam.

Corroboration of Bentan's and Ianc's statements

32. The information provided by Bentan and Ianc regarding the scheme generally, and the participation of TOADER, SAVU, BALINT, and GHIGHINA specifically, has been corroborated by other evidence in material respects.

33. Bentan and Ianc have identified SAVU as an associate of TOADER, and Bentan specifically identified the counterfeit Iowa driver license in the name of "Dana Shotzwann" as depicting SAVU. Law enforcement has obtained records from the Devon McCormick Currency Exchange in Chicago, Illinois, indicating that the "Shotzwann" ID was used to receive a Western Union wire transfer of funds from Victim KM in New Mexico on July 17, 2006. In addition, the Internet Crime Complaint Center (IC3) has received complaints from 4 additional individuals indicating that they sent funds totaling approximately \$11,885 via Western Union to "Dana Shotzwann" in Chicago in order to purchase a car but never received the vehicle they had agreed to purchase.

34. For example, victim HD reported that on July 15, 2006, s/he saw a 95 Honda Civic on eBay and emailed the person identified as the seller, Dana Shotzwann, 4615 W. Huron Street, Chicago, Illinois, about purchasing the vehicle for \$2,900. Victim HD stated that s/he sent the funds on July 18, 2006, from a Western Union agent located in New Iberia, Louisiana. Western Union advised Victim HD that the funds were received on July 19, 2006. Victim HD did not receive the vehicle.

35. Bentan and Ianc have also both identified BALINT as an associate of TOADER, and Bentan specifically identified BALINT as the person depicted in the photographs of counterfeit Wisconsin driver licenses in the name of "George Brown," "Dan Ackerman," "Paul Schultzer," and "George Goodman," and a counterfeit Texas drivers license in the name of "Kevin Walker."

36. Law enforcement has obtained records from the Foster Currency Exchange in Chicago, Illinois, Western Union, and victims of the scheme, indicating that the counterfeit "George Brown," "George Goodman," "Paul Schultzer," and "Kevin Walker" IDs were used to receive Western Union wire transfers of funds sent by individuals at various times between July 2005 and January 2006 in amounts totaling approximately \$63,000.

37. Additionally, Victim SG has provided a statement and documents to law enforcement relating to a Western Union wire transfer of \$2,750 from Connecticut to "George Brown" in Chicago, Illinois. Victim SG stated that s/he sent the funds after visiting eBay looking for an ATV to purchase. Victim SG provided a receipt indicating that s/he sent the funds on September 26, 2005, from Fairfield, Connecticut to Chicago, Illinois. Records obtained from Western Union indicate the wire transfer was received by "Brown" on September 26, 2005, at the Park West Currency Exchange in Chicago, Illinois. Law enforcement has also received internet fraud complaints involving Western Union wire transfers of funds to the "Ackerman" and "Schultzer" aliases.

38. Bentan also described "Rosu" (ADRIAN GHIGHINA) as an associate of

TOADER who participated in the fraud scheme, and specifically identified "Rosu" as the individual depicted on the counterfeit Iowa IDs in the name of "Dan Flinchum," "Maurice Schuman," and "Dan Smith." Law enforcement has obtained records from currency exchanges, Western Union, and victims of the scheme indicating that the "Dan Flinchum" and "Dan Smith" IDs have been used to receive Western Union wire transfers between approximately October and November 2005 in amounts totaling approximately \$24,800.

39. For example, Victim CM has reported to law enforcement that s/he was looking for female Maltese puppies for sale on the internet and agreed with "Dan Smith" to purchase a puppy for \$850. Victim CM provided a copy of a Western Union receipt indicating that s/he sent the funds on November 2, 2005, from Azle, Texas, to "Dan Smith" in Chicago. According to records obtained from Western Union, the funds were received by "Dan Smith" at the Foster Currency Exchange on November 2, 2005. Victim CM did not receive the dog she had agreed to purchase.

40. Additionally, evidence gathered by law enforcement from the cellular telephones of Bentan and Bledea further corroborates the statements of Bentan and Ianc regarding the involvement of TOADER, BALINT, and SAVU in the fraud scheme. Prior to being charged in the Indicted Case, Bentan was arrested by the Evanston Police Department on October 28, 2005, after he attempted to pick-up a Western Union wire transfer of funds at a currency

exchange.⁶ At the time of his arrest, Bentan was in possession of a counterfeit Indiana driver's license in the name of "Roberto Fiorenza" which bore a photograph depicting Bentan. Bentan was also in possession of two cellular telephones (one of which was a Motorola RZR) and a scrap of paper on which the name "TOADER Gheorge" had been written.

41. The second to last call that Bentan made on his Motorola RZR telephone prior to being arrested at the currency exchange was to (773) 454-9458, identified in the directory of Bentan's telephone as belonging to "GAB."

42. According to records provided to the government by Bank of America, customer GABRIEL TOADER maintained a savings account and three checking accounts at Bank of America during 2005. The telephone number of record for each account was (773) 454-9458, and the address of record for each was 3201 W. Devon Avenue, Chicago, Illinois. According to records provided by MoneyGram, at various times between October 2005 and April 2006, customer GABRIEL TOADER wire transferred funds totaling approximately \$49,000 to various individuals in Romania, in most instances indicating that his telephone number was (773) 454-9458, with an address of 3201 W. Devon, Chicago, Illinois. According to records maintained by the Illinois Secretary of State (SOS), the address appearing on

⁶Bentan provided a statement to the Evanston Police when arrested, but did not implicate TOADER, SAVU, BALINT, or any other named individual in the scheme at that time.

TOADER's drivers license is 3201 W. Devon, Apt. 5, Chicago, Illinois.⁷

43. As previously described above, Bentan and Ianc also identified Mihai Bledea as a participant in the fraud scheme. Bledea admitted participating in the fraud scheme by pleading guilty in the Indicted Case to one count of mail fraud on July 24, 2007. Bledea admitted in his plea agreement that between approximately December 2004 and August 2006, he used false identification documents in 22 different alias names to receive fraud proceeds from Western Union.⁸ Based upon information developed by the government during the investigation, Bledea received more than \$400,000 in funds sent by victims of the scheme using those 22 aliases.

44. Prior to being charged by the Federal government in the Indicted Case, Bledea was arrested by the Hillside Police Department after he attempted to pick-up money from a Western Union agent on August 21, 2006, at approximately 12:30 pm. At the time of his arrest, the Hillside Police officers seized from Bledea two cellular telephones, one of which was a Motorola RZR.

45. Bledea's RZR cellular telephone was searched by law enforcement and found to contain TOADER's telephone number, (773) 454-9458, identified in the directory as belonging to "Gabi Camatar." The directory of Bledea's cellular telephone also contained a number for "CRISTINA SAVU," (773) 577-9485.

⁷Bentan identified the person depicted on the Illinois Secretary of State photograph associated with the TOADER drivers license as the individual he knew to be GABRIEL TOADER.

⁸Bledea did not agree to cooperate with the government.

Notably, Bledea's RZR received a call from the SAVU number on August 21, 2006, shortly after his arrest, and received a call from the TOADER number in the afternoon the day before Bledea's arrest.

46. The directory of Bledea's RZR cellphone also contained an entry for "Bebe Nr Bun," indicating that "Bebe's" telephone number was (941) 266-0419. Bentan and Ianc told law enforcement that they knew BELA BALINT to use the nickname "Bebe." According to records received from MoneyGram, between approximately October 2, 2005, and May 16, 2006, BELA BALINT wire transferred funds on a number of occasions totaling approximately \$26,900 to various individuals in Romania, including, on two occasions "Gheorghe TOADER." On each occasion that he wire transferred funds, BALINT indicated to MoneyGram that his telephone number was (941) 266-0419 and that his address was 3201 W. Devon, the same address used by TOADER.

47. Bledea was arrested by Federal agents on December 9, 2006, after the filing of the criminal complaint that preceded the Indicted Case, and at that time Bledea was in possession of another cellular telephone. The same numbers for TOADER and "Bebe" were again found in the directory of Bledea's new cellphone.

48. Additionally, as further illustrated below, comparison of the counterfeit Wisconsin identification documents used by BALINT and Bledea revealed striking similarities, suggesting that they shared a source for their false IDs:

Subject	Alias	ID#	Issue Date
BALINT	"George Goodman"	G685-6408-0687-08	09-18-04
Bledea	"Anthony Verlofsky"	V685-6408-0687-08	09-18-04
BALINT	"George Brown"	B785-6408-0687-08	09-18-04
Bledea	"James Hastings"	H685-6408-0687-25	09-18-04

All four false IDs also incorrectly used the letters "BRN" to designate on their face that the license holder had brown eyes or hair, whereas an authentic Wisconsin drivers license uses the letters "BRO" to designate the color brown.

49. As previously described above, Bentan advised the government in December 2006 that he believed BELA BALINT was conducting money pick-ups for TOADER in Florida. I have reviewed records made available on the internet by the Sheriff's Office in Pinella County, Florida, which indicate that BALINT was booked on February 15, 2007, after being charged with a number of felony offenses, including (i) scheme to defraud (less than \$20,000) and (ii) unauthorized possession of drivers license or identification card.

50. As previously described above, Ianc stated that he believed SAVU was driving a white Mercedes owned by Raimondoray Cerna and that SAVU had been arrested while participating in the Western Union fraud scheme. According to information provided by the Chicago Police Department (CPD), SAVU was stopped on November 9, 2006 by the CPD while driving a white Mercedes Benz, VIN# WDBNG75J9YA057202. SAVU was arrested as a result of an outstanding warrant.

51. During the arrest of SAVU and subsequent search of the automobile,

counterfeit Wisconsin and Michigan IDs depicting SAVU (the IDs discussed above in ¶ 22) were recovered. At this time, according to records maintained by the Illinois Secretary of State, the vehicle was registered to GABRIEL TOADER, 3201 W. Devon Avenue, Apt. 5, Chicago, Illinois. The vehicle was previously registered in the state of Illinois to Gabriel Constantin, and law enforcement agents observed Raimondoray Cerna driving this vehicle on August 16, 2005.

52. At the time of her arrest by CPD, law enforcement agents also recovered a Western Union receipt dated November 9, 2006, indicating that "Michele Keolman" had received \$2,900 at the New Randolph & Halsted Currency Exchange transmitted by Victim MM. SAVU also possessed United States currency totaling approximately \$6,700.

53. At the time of Bledea's arrest by Federal agents, he possessed a laptop computer which was subsequently searched by law enforcement. A number of photographs which corroborate the statements of Ianc and Bentan regarding the association of SAVU, BALINT, and TOADER with each other and with other participants in the Western Union scheme were recovered, including the following:

- Photographs depicting SAVU, BALINT, TOADER, and Bledea as passengers in a limousine (files named: 7-26-2006-10.jpg; 7-26-2006-13.jpg; 7-26-2006-15.jpg; 7-26-2006-17.jpg);
- A photograph depicting BALINT, TOADER, Bentan, and Constantin at a restaurant;
- A photograph depicting SAVU, Bledea, and Constantin; and
- Numerous photographs depicting Individual AD

54. Law enforcement has obtained records from JP Morgan Chase Bank relating to two accounts associated with TOADER. One account was a personal

account in TOADER's name, the other was a business account in the name of "TDG Consulting," for which TOADER was a signatory. (I believe the initials "TDG" were derived from TOADER's full name, Gabriel Dragos Toader.)

55. Between approximately November 2005 and May 2006, cash totaling approximately \$439,000 was deposited into TOADER's personal Chase account and the TDG Consulting account. Between approximately October 2005 and May 2006, approximately \$416,000 was wire transferred out of TOADER's personal Chase account and the TDG Consulting account to various individuals and entities in Romania and Cyprus, including "Kazira LLC."

56. For example, on or about November 4, 2005, according to records from JP Morgan Chase, Gabriel Toader deposited cash totaling \$15,050 in his TDG Consulting account. The same day, \$15,050 was wire transferred from the TDG Consulting account to the Alpha Bank Nicosia, Cyprus, for the benefit of "Kazira LLC."

57. ADRIAN GHIGHINA was also an account holder at JP Morgan Chase, and records provided by the bank indicate that between approximately January 2006 and June 2006, cash totaling approximately \$83,700 was deposited into GHIGHINA's account. Between approximately September 2005 and May 2006, approximately \$98,000 was wire transferred out of GHIGHINA's account to various individuals and entities in Romania and Cyprus. In many instances, the funds were transferred to an account associated with "Kazira LLC" in Cyprus.

58. Review of financial records also revealed instances in which the co-

schemers wire transferred funds to the same individual in Romania. For example, according to records provided by MoneyGram, between March and April 2006, TOADER, GHIGHINA, and the wife of Bentan wire transferred funds to Romania totaling approximately \$16,000 to "Stan Julian," "Stan Alexandru Julian," or "Alexandru Julian Stan."⁹

59. Also, in May 2006, MoneyGram records indicate that the wife of Bentan wire transferred approximately \$2,900 to "Dumitru Ionut Sorin." Records obtained from JP Morgan Chase indicate that the account of "Dumitru Ionut Sorin" at the Alpha Bank Romania was the beneficiary of two wire transfers from GHIGHINA's Chase account in May 2006 totaling approximately \$18,000.


60. In addition, according to records obtained from MoneyGram, between October 2005 and January 2006, TOADER, GHIGHINA, and Bentan each wire transferred funds to Lina Toader in Romania.

61. In each instance in which GHIGHINA wire transferred funds to Romania through MoneyGram, GHIGHINA's address of record was noted as 3201 W. Devon Avenue – the same address used by TOADER and BALINT.

⁹Although the names varied slightly, MoneyGram's records indicate that the funds were received in each instance by an individual who presented an identification document numbered FF 344464.


CONCLUSION

62. Based upon the foregoing facts, there is probable cause to believe that DRAGOS GABRIEL TOADER has committed a violation of Title 18, United States Code, Section 1957(a), and that CRISTINA SAVU, BELA BALINT, and ADRIAN GHIGHINA have committed violations of Title 18, United States Code, Section 1343.



Matthew Siffermann, Special Agent
Immigration and Customs Enforcement

SUBSCRIBED AND SWORN TO BEFORE ME
this 21st day of December, 2007.


SIDNEY I. SCHENKIER
U.S. MAGISTRATE JUDGE